## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LARRY RILEY, JR., Executor of the : Estate of Larry Riley, Sr., Deceased :

Plaintiff : CIVIL ACTION

: MEDICAL PROFESSIONAL

v. : LIABILITY

JURY TRIAL DEMANDED

ANDREW HENCH, RN, HOLY SPIRIT

HOSPITAL OF THE SISTERS OF :

CHRISTIAN CHARITY, INC., Individually: and/or t/d/b/a GEISINGER HOLY SPIRIT : HOSPITAL, and PENN STATE HEALTH : HOLY SPIRIT MEDICAL CENTER :

Defendants : NO.

## CERTIFICATE OF MERIT AS TO HOLY SPIRIT HOSPITAL OF THE SISTERS OF CHRISTIAN CHARITY, INC., Individually and/or t/d/b/a GEISINGER HOLY SPIRIT HOSPITAL

I, John M. Mulcahey, Esq., certify that:

[X] an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

## **AND**

[X] the claim that this defendant deviated from an acceptable professional standard is based on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell

outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

[] expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

/s/John M. Mulcahey
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